

Attachment: Item 5.1 Public Comments

Section I. Responses to comments

City of Anaheim	General, Land Use
City of Irvine – Office of the City Manager	General, Land Use
City of Irvine – Office of the Mayor	General
City of Chino – Community Development Department	Open Space, Transportation
City of Lake Forest – Department of Development Services	General
City of Tustin – Office of the City Council	General
Department of Transportation (CalTrans) – District 12	General
Orange County Transportation Authority (OCTA)	General, Transportation, Energy, Air Quality, Land Use, Open Space
Building Industry Association of California (BIA)	General, Land Use, Open Space, Water, Air Quality
The City Project	General, Open Space, Education
California Construction and Industrial Materials (CalCIMA)	Mineral Resources
Green Institute for Village Empowerment (GIVE)	General, Green Economy, Security, Solid Waste
South Coast Air Quality Management District (SCAQMD)	General, Air Quality, Transportation
Frank Hotchkiss (verbal comment)	Energy
Kathryn McCullough (verbal comment)	General, Education/Economy
Gateway Cities Council of Governments (GCCOG)	General

Section II. Comment letters.

Comment letters are in the same order as above.

City of Anaheim – Planning Department

Category	Comment	Recommended Response	Recommended RCP Edits
General	The RCP offers helpful information and analysis relative to the nine topical areas addressed. It is also helpful towards identifying various programs and policies that local governments may implement to help address regional challenges.	Comment noted.	None.
	Concern with use of Compass Blueprint as sole goal of the Land Use and Housing Chapter of the RCP.	Comment noted. Compass Blueprint as described in the Land Use and Housing chapter comprises a full range of land use and housing issues, including housing supply, affordability, land use efficiency, and access to jobs and amenities.	None.
	Concerned that the RCP does not reflect the collective goals and vision for the region.	Comment is noted and will be forwarded to the decision-makers prior to the adoption of the Final RCP.	None.
	<p>Anaheim staff supports the following actions regarding the RCP approved by the OCCOG board:</p> <ol style="list-style-type: none"> 1. Offers technical comments and recommendations on the draft 2008 Regional Comprehensive Plan, as detailed in Attachment 4 of the July 24, 2008 Board's staff report for Item #7 and provided as Attachment 2 of the Supplemental Attachment for the same meeting that was distributed under separate cover. 2. Recommends that the draft 2008 Regional Comprehensive Plan be revised and reviewed through a re-activated SCAG Plans and Programs Technical Advisory Committee before being re-distributed. 3. Recommends that the SCAG RCP Task Force-recommended timeline for the draft 2008 Regional Comprehensive Plan be extended to address public comments and recommendations. 4. Recommends that the draft 2008 Regional Comprehensive Plan be amended throughout to reflect the voluntary nature of the document as a menu of policy program options available for local governments and other stakeholders in the region. As a voluntary compilation of options, the 2008 Regional Comprehensive Plan should not be used as a policy guidance for SCAG nor should it be used in any SCAG mandated program, including intergovernmental review. 	Comment noted. Please see response to OCCOG comments	Please see response to OCCOG comments

City of Irvine – Office of the City Manager

Category	Comment	Recommended Response	Recommended RCP Edits
General	<p>The City of Irvine offers the following recommendations:</p> <ol style="list-style-type: none"> 1. That SCAG staff and the RCP Task Force should address all technical comments and recommendations on the draft 2008 Regional Comprehensive Plan, as detailed in the comment letter from the Orange County Council of Governments, dated August 5, 2008, distributed under separate cover. 2. That the draft 2008 Regional Comprehensive Plan be revised and reviewed through a re-activated SCAG Plans and Programs Technical Advisory Committee before being redistributed. 3. That the SCAG RCP Task Force 3. That the SCAG RCP Task Force recommended timeline for the draft 2008 Regional Comprehensive Plan be extended to address public comments and recommendations. 4. That the draft 2008 Regional Comprehensive Plan be amended throughout to reflect the voluntary nature of the document as a menu of policy and program options available for local governments and other stakeholders in the region. As a voluntary compilation of options, the 2008 Regional Comprehensive Plan should not be used as policy guidance for SCAG nor should it be used in any SCAG mandated program, including inter-governmental review. 	Comment noted. Please see response to OCCOG comments	Please see response to OCCOG comments
Land Use	The City of Irvine is concerned that the text indicates that the SCAG Compass Blueprint maps associated with the Compass Blueprint program are inconsistent with the City's General Plan and Zoning Ordinance.	Comment noted. The Regional Comprehensive Plan is an advisory plan that envisions what a livable, sustainable, successful region could look like. The desired outcome is that 100% of local General Plans be qualitatively consistent with Compass Blueprint principles. It is not expected that all General Plans will quantitatively mirror any particular growth forecast scenario. Further note that making refinement to the Compass Blueprint program such that it achieves regional consensus, is an on-going effort and commitment of SCAG. The City's input has been and will continue to be integral to this process.	None.

City of Irvine – Office of the Mayor

Category	Comment	Recommended Response	Recommended RCP Edits
General	<p>Address the following recommendations:</p> <ol style="list-style-type: none"> 1. That the draft 2008 Regional Comprehensive Plan be revised and reviewed through a re-activated SCAG Plans and Programs Technical Advisory Committee before being redistributed. 2. That the SCAG RCP Task Force recommended timeline for the draft 2008 Regional Comprehensive Plan be extended to address public comments and recommendations. 3. The draft 2008 Regional Comprehensive Plan be amended throughout to reflect the voluntary nature of the document as a menu of policy and program options available for local governments and other stakeholders in the region. As a voluntary compilation of options, the 2008 Regional Comprehensive Plan should not be used as policy guidance for SCAG nor should it be used in any SCAG mandated program, including inter-governmental review. 	Comment noted. Please see response to OCCOG comments	Please see response to OCCOG comments
	Request that SCAG staff and the RCP Task Force should address all technical comments and recommendations on the draft 2008 Regional Comprehensive Plan, as detailed in the comment letter from the Orange County Council of Governments, dated August 5, 2008, distributed under separate cover	Comment noted. Please see response to OCCOG comments	Please see response to OCCOG comments

City of Chino – Community Development Department

Category	Comment	Recommended Response	Recommended RCP Edits
Open Space and Habitat – Natural Lands	OSN-12 – Please provide additional information on how consistency with open space conservation policies and goals will be determined. Additionally, please provide information on which funding opportunities and programs are envisioned to be dependent on conformance with this policy.	Consistency will be determined through SCAG's intergovernmental review (IGR) process. Comments to lead agencies are advisory as are any other comments in a CEQA process. The RCP does not intend for new priorities or processes to impact any specific funding stream or program. Rather, it merely states a generalized objective that the region's activities should support coherent policy objectives. Any specific proposal to impact actual funding distribution would be beyond the scope of the RCP and is subject to additional discussion	None.
Transportation	TR-1S – This initiative states that SCAG, transportation commissions, local governments, and other project proponents should use the Compass Blueprint to influence the funding of future transportation planning and investments. How would this be structured to fairly benefit agencies both within and outside the boundaries of the Compass Blueprint?	The RCP does not intend for new priorities or processes to impact any specific funding stream or program. Rather, it merely states a generalized objective that the region's activities should support coherent policy objectives. Any specific proposal to impact actual funding distribution would be clearly subject to additional debate and discussion.	None.

City of Lake Forest – Department of Development Services

Category	Comment	Recommended Response	Recommended RCP Edits
General	Support comments recommendations on the draft 2008 Regional Comprehensive Plan submitted by the Orange County Council of Governments in the letter dated August 5, 2008. Emphasize request to amend the document "to reflect its voluntary nature as a menu of policy and program options available for local governments and other stakeholders in the region. As a voluntary compilation of options, the 2008 Regional Comprehensive Plan should not be used as policy guidance for SCAG nor should it be used in any SCAG mandated program, including intergovernmental review."	Comment noted. Please see response to OCCOG comments	Please see response to OCCOG comments
General	Support the action taken by SCAG's Community, Economic and Human Development (CEHD) policy committee (taken Aug. 7, 2008) to bring the RCP back for review at the Sept. 4, 2008 CEHD meeting.	Comment noted. Please see response to OCCOG comments	Please see response to OCCOG comments

City of Tustin – Office of the City Council

Category	Comment	Recommended Response	Recommended RCP Edits
General	<p>Support the comments and recommendations by the Orange County Council of Governments (OCCOG) Board which include the following actions:</p> <ol style="list-style-type: none"> 1. Provided technical comments and recommendations on the draft 2008 RCP. 2. Recommended that the draft 2008 RCP be revised and reviewed through a reactivated SCAG Plans and Programs Technical Advisory Committee (TAC) before being redistributed. 3. Recommend that the review period for the draft RCP be extended. 4. Recommend that the draft 2008 RCP be amended throughout to reflect the voluntary nature of the document as a menu of policy and program options available for local governments and other stakeholders in the region; and that the documents not be used as policy guidance for SCAG nor in any SCAG mandated program, including intergovernmental review. 	Comment noted. Please see response to OCCOG comments	Please see response to OCCOG comments

California Department of Transportation (Caltrans) – District 12

Category	Comment	Recommended Response	Recommended RCP Edits
General	<p>Caltrans supports stakeholders who endeavor to develop a holistic, strategic plan through a collaborative process addressing inter-related regional challenges. The RCP also responds to a Caltrans Blueprint Planning Program goal to foster a more efficient land use pattern that supports mobility, accommodates an adequate housing supply, reduces impact on habitat, farmland, and air quality, increases resource efficiency, and results in safe and vibrant neighborhoods.</p>	Comment is noted and will be forwarded to the decision-makers prior to the adoption of the Final RCP.	None.

Orange County Transportation Authority (OCTA)

Category	Comment	Recommended Response	Recommended RCP Edits
General	OCTA believes the 2008 RCP will be a useful resource for developing strategies to address the issues facing the SCAG region in the coming years.	Comment is noted and will be forwarded to the decision-makers prior to the adoption of the Final RCP.	None.
General	The RCP should clearly state that SCAG does not intend to use the RCP to comply with existing or future State requirements. If the State should require a "blueprint" or "sustainable communities strategy" to be developed and adopted by SCAG, an entirely new document should be developed.	Comment noted. Language to this effect is included in the proposed resolution to adopt the RCP.	None.
General	Some terminology throughout the RCP is technical and vague. Define terms to improve clarity.	Comment noted. Revisions for clarity and readability are being recommended in multiple places in the document.	None.
Transportation	Clarify the advisory nature of land-use policies and strategies. Text that reflects issues in Regional Transportation Plan (RTP) should correspond more closely with language used in RTP.	Comment noted and revision recommended.	Under "Strategic Growth Linked to Transportation on page 111, the opening sentence will be revised to read <i>"The 2008 RTP will continue to promote <u>voluntary</u> land use policies that have been demonstrated to potentially be both regionally beneficial, and reflective of their transportation performance..."</i>)
Transportation	Strategy to maximize market-based incentives to reduce VMTs should include discussion of congestion management and reducing vehicle hours of delay (VHD). Include reducing VHD as part of transportation goals.	Comment noted. The transportation Chapter was developed under the guidance of the Transportation Committee and RCP Task Force. The Regional Council may revisit the Transportation Chapter goals at their discretion.	None.
Transportation	Strategic Initiative stating project proponents use Compass Blueprint should be changed to "consider" using it.	Comment noted and revision recommended.	Revise as suggested in the comment.
Energy	Alter language clarifying CTCs and local agencies are encouraged to consider prioritizing funding for energy efficient transportation projects. Current discussion and language on prioritizing funding for energy efficient transportation is too strong.	Comment noted and revision recommended	Revise section to read "SCAG has the opportunity to work with its partners, including CTCs, to increase funding of public transportation . . ."
Air Quality	Alter language clarifying CTCs and local agencies are encouraged to consider RCP principles when prioritizing funding for projects. Current discussion on prioritizing funding for projects based on the RCP is cause of concern.	Comment noted. The RCP does not intend for new priorities or processes to impact any specific funding stream or program. Rather, it merely states a generalized objective that the region's activities should support coherent policy objectives. Any specific proposal to impact actual funding distribution would be clearly subject to additional debate and discussion.	None.
Air Quality	Clarify "electrification" in AQ-2.3. Remove reference to rail electrification since no such projects are included in RTP.	Comment noted. While this does not refer to electrification of rail, the RCP will be revised to consolidate the climate change policies in the air quality chapter relative to working with our stakeholders and ARB on implementing climate change laws and initiatives.	None.

Open Space & Habitat	Unclear how correlation between a transportation project and growth would be determined. Impacts to natural lands could be unjustly attributed to transportation projects. This policy should be omitted.	Comment noted. It is not SCAG's intention to place an undue burden on projects or project delivery in the region.	The following edit is suggested to make the policy consistent with existing policy and law: strike "growth that accompanies"
Open Space & Habitat	Omit policy suggesting open space should be preserved at a one-to-one ratio. The phrase "open space" is too broad, could suggest that brownfield developments should be preserved as open space. One-to-one preservation ratio should be determined on a project-by-project basis.	The policy is intended to state a generalized goal for open space preservation and is not applicable at the project or jurisdictional scale. In addition, the open space and habitat chapter policies included in the Draft RCP were developed under the guidance of the Open Space Working Group and RCP Task Force and approved for review by the respective Policy Committees for each chapter. The Regional Council may revisit the Open Space and Habitat Chapter policies at their discretion.	None.

Building Industry Association of Southern California (BIA)

Category	Comment	Recommended Response	Recommended RCP Edits
General	The RCP should not be incorporated into SCAG's Intergovernmental Review (IGR) Process. It should be used as a voluntary guidance document and not be used as part of SCAG's IGR Process. If used in IGR process, the broad-based objectives in the RCP will increase lawsuits.	Comment noted. The use of RCP policies in Intergovernmental Review does not fundamentally impact the voluntary nature of the RCP, as IGR comments are not binding. Comments to lead agencies are advisory as are any other comments in a CEQA process. SCAG is unaware of instances in which its IGR comments have created a hardship for project sponsors or lead agencies.	None.
General	SCAG should not move forward with the draft RCP and wait for SB 375 and AB 32 to require a regional plan.	Comment noted.	None.
Land Use and Housing	One-size-fit-all approach in Land Use and Housing chapter is unreasonable.	Comment noted. Note that making refinement to achieve regional consensus is an on-going effort and commitment of SCAG. Each jurisdiction's input has been and will continue to be integral to this process such that the region's growth strategy is compatible with local priorities and other factors.	None.
Land Use and Housing	Question the validity of Compass Blueprint Growth Vision (Compass) and the 2% approach. Define "2% Strategy"	Comment noted. The Compass Blueprint 2% Strategy is a guideline for how and where we can implement the Growth Vision for Southern California's future. It calls for modest changes to current land use and transportation trends on only 2% of the land area of the region - the 2% Strategy Opportunity Areas. The 2% Strategy Opportunity Areas comprise approximately 2% of the land in Southern California and are made up primarily of: Metro Centers, City Centers, Rail Transit Stops, Bus Rapid Transit Corridors, Airports, Ports, and Industrial Centers, Priority Residential In-fill Areas, and Compass Blueprint Priority Communities. Investing our planning efforts and resources according to the 2% Strategy will yield the greatest progress toward improving measures of mobility, livability, prosperity and sustainability for local neighborhoods and their residents.	None.
Land Use and Housing	Placing emphasis on housing located near planned and existing transit stations would impact housing affordability.	Comment noted. Emphasis on housing located near planned and existing transit stations does not necessarily indicate restriction of housing development in other areas. Furthermore, emphasis on housing development around transit station areas would reduce commute costs and the reliance on automobiles so that to reduce emission and improve air quality.	None.
Land Use and Housing	SCAG should not advocate for the protection of "important open space" or "environmentally sensitive areas." Decisions	Comment noted. The Regional Comprehensive Plan is intended as an integrated multi-disciplinary plan	None.

	regarding open space should not be interpreted at the regional level. Terms are ambiguous and not defined.	that leads to balanced decision-making. Nevertheless its policies are advisory for local governments.	
Land Use and Housing	Establishing an artificial measurement such as one housing unit for every three persons in population growth would eliminate flexibility for local governments to make land-use decisions. SCAG should not make any recommendations based on any formula. Local housing decisions should remain at the discretion of locally elected officials.	Comment noted. The performance indicators are intended to be applied at regional scale and serve as benchmarks for the region's future performance.	None.
Land Use and Housing	The RCP should note the effect that mandated government fees have on housing affordability.	Comment noted. Edit recommended.	Edit to include language on fee and permit processes on Page 14.
Land Use and Housing	Housing vacancy rates in a local community will differ from regional vacancy rates. Regional vacancy rates as outlined in the RCP will be interrupted as a control method for certain type of housing projects and should be removed from the RCP.	Comment noted. The performance indicators are intended to be applied at regional scale. Regional vacancy rates will not be applied as a control for certain type of housing, or for specific local communities.	None.
Land Use and Housing	The RCP should not overlook housing choice as a priority. By suggesting a reduction in land being used for housing, SCAG will be limiting choice for families.	Comment noted. While Land Use and Housing Chapter incorporates outcomes that seek to increase the efficiency of development overall, it does not in any way suggest a reduction in the amount of land used for housing. Further, SCAG believes that by focusing a greater share of development in strategic locations, including in in-fill settings, that housing choice for families will be expanded.	None.
Land Use and Housing	SCAG should encourage local governments to build to standards that have been reviewed and approved by the state, in-lieu of suggesting each jurisdiction to adopt their own standards for construction (such as the state-wide Green Building Standards).	Comment noted. The RCP provides a regional goal that jurisdictions may choose to incorporate into their planning framework. SCAG may update or revise this policy as more standardized practices for green building, including State guidelines, are developed.	None.
Open Space & Habitat	SCAG should review its primary mission and focus more on transportation related issues. The open space chapter is one of the biggest chapters in the RCP and transportation one of the smallest.	Comment noted. Each chapter contained in the RCP was developed under the guidance of the RCP Task Force, policy committees and in many cases chapter specific working groups. The Regional Council may revisit chapter content at their discretion.	None.
Open Space & Habitat	SCAG should focus on its core competency - transportation planning. SCAG should not spend resources on land acquisition services for private non-profit organizations or identifying potential sources of funding for land preservation. The SCAG IGR process should not include open space determinations.	Comment noted. The RCP does not intend for new priorities or processes to impact any specific funding stream or program. Rather, it merely states a generalized objective that the region's activities should support coherent policy objectives. Any specific proposal to impact actual funding distribution would be subject to additional discussion.	None.
Water	Development should not be held responsible for the region's water quality goals. Regional approaches should be evaluated by the Regional Water Quality Control Boards within SCAG's territory.	Comment noted. It is not the intention of the RCP to make the development industry responsible for water quality goals. Rather, the intention is to encourage the all parties to consider the water quality impacts of development choices, in both location and design.	None.

Water	Impervious surface decisions should only be considered at a local level. Water must be removed from an area quickly in order to protect lives and property.	Comment noted. Impervious surface and other runoff design considerations should be considered across scales, to inform best practices. Watershed-scale planning related to water quality issues is common practice. The BIA has advocated strongly for less proscriptive design regulations in dealing with water quality issues rising from development; the RCP supports the idea that by planning within a watershed framework, regulation can be more effective. Protection of lives and property is always primary in stormwater design.	None.
Air Quality	SCAG should continue to advocate stronger regulations on mobile sources and not unduly suggest additional restrictions on land use.	SCAG has and continues to advocate for the use of cleaner mobile source technologies. Concurrently, SCAG supports comprehensive land-use decision making that considers the benefits of "smart growth" principles.	None.
Air Quality	The RCP recommends residential development is incompatible with freeways. The BIA believes locating residential and other types of development near existing transportation infrastructure can reduce emissions from mobile sources, thereby enhancing air quality.	The RCP seeks to make the connection between land use and exposures air pollution. While SCAG's Compass Blueprint Growth Vision encourages growth in existing and emerging centers and along major transportation corridors, there is recognition that exposure to harmful pollutants is correlated to distance to emission sources, including freeways (especially those with high volumes of diesel vehicles). Thus, care and due diligence are necessary when making land-use decisions, and the RCP encourages balancing the benefits of targeting growth near transportation infrastructure, especially transit, while being mindful of potential exposures to harmful air pollutants. The RCP is intended to be a comprehensive policy document that considers the interplay among numerous resource areas and the between regional and local planning considerations.	None.
Air Quality	The messages in the Land Use and Housing Chapter is inconsistent with those in the Air Quality Chapter. The RCP suggests condensed development but the Air Quality Chapter suggests buffers between uses. This illustrates the need for flexibility at the local level and highlights the challenge faced in the IGR process.	The RCP seeks to make the connection between land use and exposures air pollution. While SCAG's Compass Blueprint Growth Vision encourages growth in existing and emerging centers and along major transportation corridors, there is recognition that exposure to harmful pollutants is correlated to distance to emission sources, including freeways (especially those with high volumes of diesel vehicles). Thus, care and due diligence are necessary when making land-use decisions, and the RCP encourages balancing the benefits of targeting growth near transportation infrastructure,	None.

		especially transit, while being mindful of potential exposures to harmful air pollutants. The RCP is intended to be a comprehensive policy document that considers the interplay among numerous resource areas and the between regional and local planning considerations.	
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The City Project

Category	Comment	Recommended Response	Recommended RCP Edits
Open Space & Habitat	Commend SCAG's multi-agency approach to improving park access, especially in low income communities as discussed in SCAG's Regional Transportation Plan Environmental Justice Report. Urge SCAG to continue this leadership by presenting a region-wide vision and strategic plan for southern California to alleviate inequities in access to green space and transit in the final Regional Comprehensive Plan (RCP). Principles 1-10 (Section VII. Conclusion) will help provide the necessary framework.	Comment is noted and will be forwarded to the decision-makers prior to the adoption of the Final RCP.	None.
Open Space & Habitat	SCAG should also articulate its commitment to respectful government to government consultation between local governments and tribal nations in the final RCP. The SCAG RCP Open Space and Habitat Chapter should include a discussion of the relevant cultural resource protection and tribal consultation laws and strategies for improving dialogue between tribal nations and local governments.	Comment noted. The discussion of cultural resources is outside of the scope of the current RCP; additional work on cultural resource protection and tribal consultation laws could be performed as a follow up to the RCP at the discretion of the Regional Council. SCAG will consider preparing the suggested discussion in future updates or amendments to the RCP.	None.
Open Space & Habitat	Southern California should develop and implement a strategic plan for a "Transit to Trails" program to take people to parks, beaches, forests, lakes, and other public natural spaces.	Comment noted. The development of a Transit to Trails" program is outside the scope of the current RCP. Additional work on such a program could be done as a follow up to the RCP at the discretion of the Regional Council.	None.
Education	Commend and support SCAG for recognizing the need for the joint use of parks, schools, and pools to create healthy, livable communities for all. Recommend that the RCP call for master joint use agreements between each city and school district in the SCAG region, including the City of Los Angeles and the Los Angeles Unified School District.	Comment noted. The education essay included in the draft RCP does not contain any policy recommendations and is only intended to set the stage for a more comprehensive discussion of education issues. However, SCAG appreciates The City Project's support of joint use planning strategies. The idea of developing master joint use agreements could be further discussed in future updates to the RCP.	None.

California Construction and Industrial Materials Association (CalCIMA)

Category	Comment	Recommended Response	Recommended RCP Edits
General	<p>SCAG should strongly consider adding a Natural Mineral Resource section to the draft RCP and incorporate a discussion of the region's significant construction aggregate mineral resource needs. SCAG's 1996 RCP noted, "Mineral resources issues do not get adequate attention under current land-use planning practices. The existing state laws for the protection of mineral resources may need to be strengthened." Proper planning is needed to ensure that the large quantities of construction aggregate needed to build our society's infrastructure is available at the lowest possible economic and environmental cost. As a regional planning body, SCAG is in a unique situation to communicate to jurisdictions that contain significant mineral deposits that those deposits are important to the infrastructure demands of the region as a whole and should be included in the mineral resource management component of their general plan.</p>	<p>Comment noted. Time and resources do not allow for the analysis suggested here. SCAG will consider preparing the suggested discussion in future updates or amendments to the RCP.</p>	<p>None.</p>

Green Institute for Village Empowerment (GIVE)

Category	Comment	Recommended Response	Recommended RCP Edits
Economy	Although the draft 2008 Regional Comprehensive Plan addresses the region's challenges and solutions, it does not chart a visionary and bold pathway for Southern California's global future. The RCP must clearly articulate the vision of our region's transition from the "gray economy" constructed around the automobiles, freeways, and oil to a "green economy" planned around digital technologies, the Internet Superhighway, and renewable energy technologies. The RCP should establish a green technology initiative, promote education of a "green collar workforce", establish a regional Energy Independence Initiative, establish land use policies that will incentive Green Digital Village Development, and promote "digital world e-trade centers"	Comment is noted and will be forwarded to the decision-makers prior to the adoption of the Final RCP. The Economy chapter addresses regional economic, environmental, health, mobility and social justice goals, and was developed under the guidance of the Community, Economic and Human Development committee and the RCP Task Force. Further detailed analysis of green technologies, green collar workforce, etc., could be performed outside of the scope of the RCP.	None.
Safety & Security	The RCP should advocate that all schools and public facilities be outfitted with solar energy and backup batteries.	Comment noted. While the RCP advocates preparation, it is not, in and of itself, a disaster preparation and mitigation document. A technical discussion on these issues could be further explored in an update to the RCP.	None.
Solid waste	The RCP should encourage home vegetable gardens and composting to reduce solid waste materials.	Comment noted. Diverting food waste away from landfills and toward composting facilities is a recommended strategy in the Solid Waste Chapter of the draft RCP. A discussion on the effectiveness of home composting and vegetable gardens as a diversion strategy could be further explored in an update to the RCP.	None.
General	The Green Valley Initiative (an effort to establish the Inland Empire as California's International Green Technology Center) should become part of the 2008 Regional Comprehensive Plan in order to assist in developing a Subregion Comprehensive Plan for the Inland Empire.	Comment noted.	None.

South Coast Air Quality Management District (SCAQMD)

Category	Comment	Recommended Response	Recommended RCP Edits
Transportation /Air Quality	Policies in the RCP should provide guidance on system continuity and efficiency in order to achieve long-term regional benefits. For example, the Goods Movement discussion should include policies and initiatives that will encourage adoption of zero emission technologies and implementation of projects that reduce engine idling and diesel emissions. The RCP should include policies that move the region towards a zero emission transportation system and a more aggressive approach should be identified for establishing freight/intermodal initiatives and policies; details of that coordination effort should be included as part of the Intergovernmental Review (IGR)/Best Practices process.	See strategic initiatives AQ-1S and AQ-2S. AQ-1S seeks to identify new SIP control strategies to reduce the amount of emissions from the regional transportation system, including transformative goods movement strategies. AQ-2S would finalize the development of the ARB, AQMD, and SCAG White Paper that will identify discrete measures to meet SIP requirements, including transformative mobile source technologies, and to build consensus on implementation of such measures.	None.
Transportation	Place emphasis on transitioning fleets to alternative fuels and on future plans for supporting infrastructure to reduce the region's use of carbon based fuels, gasoline and diesel fuels. Include this as part of the IGR/Best Practices process.	Comment noted. The RCP transportation chapter lists two outcomes (Page 114), one of which includes: "Reduce the region's use of gasoline and diesel fuel from on-road vehicles to 1990 levels by 2020, including accelerating the penetration of vehicles fueled by fuel cells or other non-petroleum based engine technologies." In addition, under "Goods Movement Strategies" the RCP mentions the RTP has various freight strategies designed to reduce emissions, for both truck and rail.	None.
Air Quality	Expand statement to indicate that SCAG will also work with project sponsors and County Transportation Commissions (CTCs) to identify specific areas for potential TCM project implementation. Language for AQ-1.1, AQ-1.2, and AQ-1.3 should indicate that these are federal requirements.	Comment noted. Edits will be made.	None.
Transportation	Language for TR-5 should indicate federal requirement.	Comment noted. The Policy as currently stated uses "shall" which indicates a requirement, not a recommendation.	None.
General	Clearly state what is meant by "the financial incentives and other means being offered by SCAG's Regional Council to promote sound planning policies and outline how jurisdictions will be able to compete and qualify to be a recipient of these incentives [Executive Summary].	Comment noted. Further note that the phrase "financial incentives" is recommended for deletion in response to previously received comments.	None.
General	Revise statement on advancing integrated policies through funding decisions to read that SCAG should commit to working with CTCs and project sponsors...	Comment noted, and revision recommended. The RCP does not intend for new priorities or processes to impact any specific funding stream or program. Rather, it merely states a generalized objective that the region's activities should support coherent policy objectives. Any specific proposal to impact actual funding distribution would be clearly subject to additional debate	Revise to read ". . . SCAG can advance integrated planning by working with CTC and other partners to establish funding priorities that achieve regional benefits."

		and discussion.	
Air Quality	Revise discussions on prioritizing funding to identify SCAG's role in conjunction with CTCs. (p. 83)	Comment noted. The RCP does not intend for new priorities or processes to impact any specific funding stream or program. Rather, it merely states a generalized objective that the region's activities should support coherent policy objectives. Any specific proposal to impact actual funding distribution would be clearly subject to additional debate and discussion.	None.
Air Quality	Define incentives as used in the statement, "SCAG will provide guidance and incentives for public agencies to adopt best practices that support the technology-based control measures in the AQMP." (pg 83)	Comment noted. The word "incentives" was inadvertently included, and will be removed.	None.
Air Quality	Revise AQ-1 to read that SCAG will work with CTCs to ensure that control measures from local Air Quality Management Plans are implemented in a timely manner.	Comment noted. Edit will be made	None.

Frank Hotchkiss – verbal comment

Category	Comment	Recommended Response	Recommended RCP Edits
Energy	The RCP should push the envelope further with respect to sustainability and energy issues.	Comment is noted and will be forwarded to the decision-makers prior to the adoption of the Final RCP.	None.

Kathryn McCullough – verbal comment

Category	Comment	Recommended Response	Recommended RCP Edits
General	Add disclaimer to each chapter that the strategies outlined in each of the RCP chapters are voluntary.	Comment noted. Language to this effect is included in the proposed resolution to adopt the RCP.	None.
Education/Economy	The Task Force should work throughout the region to look at schools and find out why it's so difficult to find employment. Education should be better addressed.	Comment noted. Both the Economy Chapter and Education Essay were developed under the guidance of the Community, Economic and Human Development Committee and the RCP Task Force. A more detailed technical discussion of education and employment issues could be provided in a follow-up to the RCP.	None.

Gateway Cities Council of Governments (GCCOG)

Category	Comment	Recommended Response	Recommended RCP Edits
General	Request that SCAG continue to work closely with the Gateway Cities COG following RCP adoption in light of SCAG's intention to track local governments' progress and performance. In particular, that a technical working group be convened involving the subregions and other stakeholders to help ensure a full and continuing opportunity for input on the development of any RCP performance measures and on the further evolution of suggested local government policies. Periodic briefings on these policies to be provided to the Gateway Cities COG board are also requested.	SCAG is committed to working with subregions and member cities on RCP policies.	None.

OCCOG comment not previously addressed

Category	Comment	Recommended Response	Recommended RCP Edits
Air Quality	Please clarify if the reference to increasing VMT, represents the overall growth in VMT that would be anticipated from increasing population or if it is representing per capita growth. (p.82)	The sentence refers to the previous paragraph that the region faces exponential growth, including number of vehicles and VMT, and the efforts to reduce emissions are especially challenging considering the expected growth.	None.



City of Anaheim PLANNING DEPARTMENT

August 9, 2008

Honorable Larry McCallon, Chair
Community, Economic and Human Development Committee
Southern California Association of Governments
818 W. Seventh Street, 12th Floor
Los Angeles, California 90017

Subject: Comments on the draft 2008 Regional Comprehensive Plan

Dear Mr. McCallon:

Over the past several months, City of Anaheim staff has actively participated in the review of the draft 2008 Regional Comprehensive Plan (RCP) which was released by the Southern California Association of Governments (SCAG) in January 2008. As a voluntary guidance document for local governments, the RCP in its current form does offer some helpful information and analysis relative to the nine topical areas addressed in the document. The document is also helpful towards identifying various policies and programs that local governments may implement to help address some of the regional challenges related to the nine topics addressed in the RCP. However, in light of the policies and strategies currently being developed in response to the passage of AB 32 and those being discussed in conjunction with the pending SB 375, the voluntary nature of the RCP cannot be assured. Therefore, it is imperative that the RCP be considered in the context of these significant pieces of legislation. This relationship suggests that the RCP warrants careful consideration to ensure that the policies and recommendations embodied in the document truly reflect the collective goals and vision for the region and to ensure that the technical information in the document is accurate and valid. With respect to this issue, Anaheim staff is concerned with SCAG's use of the Compass Blueprint as the sole goal of the Land Use and Housing Chapter of the RCP. Until stakeholders in the region agree with the vision presented in the RCP, it does not seem appropriate for SCAG to use the document as guidance for its mandated programs nor to use it to identify recommended mitigation measures for use in intergovernmental review.

Due to the potential significance of the RCP, I would also like to express concern regarding the extremely short time-line identified for SCAG to consider public comments and recommendations prior to possible action by the Regional Council. Announcements from SCAG suggest that the RCP will be considered for adoption

by the Regional Council at its September 2008 meeting, less than 30 following the August 11, 2008 close of the public comment period. A potential September adoption date for the RCP does not appear to adequately allow for a thorough regional dialogue that may be necessary to address public comments and concerns.

The Orange County Council of Governments (OCCOG) recently undertook a detailed review of the RCP document that resulted in the identification of significant policy and technical concerns. The OCCOG has also offered recommendations regarding the content of the document. In its review, the OCCOG suggests that it is unclear as to whether the document incorporates the regional vision held by all stakeholders. For example, while the significant policies calling for regional action in the Water chapter are endorsed by stakeholders including the Metropolitan Water District of Southern California, the policies included in the Security and Emergency Preparedness chapter calling for expansion of SCAG's role in the arena of security and emergency preparedness do not appear to have the same support of those stakeholders most involved, the region's emergency responders. Based upon these and other concerns, the OCCOG Board on July 24, 2008, approved the following actions regarding the RCP:

1. Offers technical comments and recommendations on the draft 2008 Regional Comprehensive Plan, as detailed in Attachment 4 of the July 24, 2008 Board's staff report for Item #7 and provided as Attachment 2 of the Supplemental Attachment for the same meeting and that was distributed under separate cover.
2. Recommends that the draft 2008 Regional Comprehensive Plan be revised and reviewed through a re-activated SCAG Plans and Programs Technical Advisory Committee before being re-distributed.
3. Recommends that the SCAG RCP Task Force-recommended timeline for the draft 2008 Regional Comprehensive Plan be extended to address public comments and recommendations.
4. Recommends that the draft 2008 Regional Comprehensive Plan be amended throughout to reflect the voluntary nature of the document as a menu of policy and program options available for local governments and other stakeholders in the region. As a voluntary compilation of options, the 2008 Regional Comprehensive Plan should not be used as policy guidance for SCAG nor should it be used in any SCAG mandated program, including intergovernmental review.

Anaheim staff fully supports the July 24, 2008 action of the OCCOG Board and respectfully requests that the CEHD recommend to the SCAG Regional Council a delay in adoption of the RCP to allow additional time for SCAG to adequately address the significant concerns and recommendations identified by the OCCOG.

Honorable Larry McCallon

August 9, 2008

Page 3 of 3

The City of Anaheim is committed to actively participating in any continued work effort on the draft 2008 RCP. Should you have any questions, please contact Tracy Sato, AICP, Senior Planner at (714) 765-4942 or at tsato@anaheim.net.

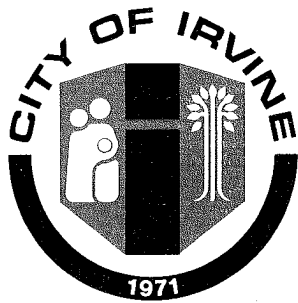
Sincerely,



Sheri Vander Dussen, AICP
Planning Director

SVD/TS/SR

cc: Honorable Robert Hernandez, Mayor Pro Tem, City of Anaheim
Honorable Richard Dixon, President, Southern California Association of Governments
Mr. Hasan Ikhata, Executive Director, SCAG
Mr. Jacob Lieb, SCAG
Mr. Dennis Wilberg, Interim Executive Director, OCCOG
Ms. Gail Shiimoto-Lohr, Consultant, City of Mission Viejo
Ms. Tracy Sato, Chair, OCCOG Technical Advisory Committee
Ms. Marty DeSollar, City of Anaheim
Mr. Greg Garcia, City of Anaheim



SEAN JOYCE, City Manager

www.ci.irvine.ca.us

City of Irvine, One Civic Center Plaza, P.O. Box 19575, Irvine, California 92623-9575 (949) 724-6249

August 7, 2008

Jacob Lieb
Program Manager
Southern California Association of Governments
818 West 7th Street, 12th Floor
Los Angeles, California 90017-3435

Dear Mr. Lieb:

The City of Irvine has completed a thorough review of the draft 2008 Regional Comprehensive Plan (RCP) and has a number of comments and concerns that should be addressed prior to the adoption of the 2008 RCP.

The City of Irvine initiated a review of the preliminary version of the draft 2008 RCP in late 2007 and conducted a more comprehensive review of the draft 2008 RCP chapters upon their release for public review in January of this year. In addition, City of Irvine staff has attended and participated in all of the scheduled RCP workshops held to date.

Irvine is concerned with the June 9, 2008 RCP Task Force recommendation that the Southern California Association of Governments (SCAG) implement several procedural steps to bring the process for developing the draft 2008 RCP to a close. Among those steps are the recommendations that the public comment period close on August 11, 2008 and that the RCP be considered for adoption at the September 4, 2008 Regional Council meeting. While the City of Irvine recognizes the importance of the draft 2008 RCP as a voluntary menu of policy and program options available for local governments and other stakeholders in the Southern California region, we strongly believe that a document of this comprehensive nature should be reviewed for technical accuracy and consistency before final adoption and implementation.

The City of Irvine has repeatedly questioned the intended use of the draft 2008 RCP and has been assured by SCAG staff that the document is completely voluntary in nature; however, the staff report for the August 2008 Community, Economic, and Human Development committee states that upon adoption, the 2008 RCP and its policies will be incorporated into the on-going mandatory Inter-Governmental Review (IGR) process. The IGR process calls on SCAG to provide comments on plans and environmental documents of regional significance. Numerous plans and environmental documents for projects in the City of Irvine are considered regionally significant and would be required to be consistent with the goals, policies, best management practices, and mitigation measures identified in the draft 2008 RCP, thereby undermining the voluntary nature of the RCP. Furthermore, the City of Irvine is concerned that

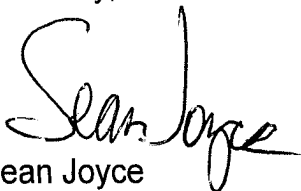
throughout the draft 2008 RCP, the text indicates that the SCAG Compass Blueprint serves as the basis for the RCP. The City has notified SCAG that the maps associated with the Compass Blueprint program are inconsistent with the City's General Plan and Zoning Ordinance.

The City of Irvine's comments and concerns are consistent with and in support of those expressed by the Orange County Council of Governments in their letter to you dated August 5, 2008. Accordingly, the City of Irvine offers the following recommendations:

1. That SCAG staff and the RCP Task Force should address all technical comments and recommendations on the draft 2008 Regional Comprehensive Plan, as detailed in the comment letter from the Orange County Council of Governments, dated August 5, 2008, distributed under separate cover.
2. That the draft 2008 Regional Comprehensive Plan be revised and reviewed through a re-activated SCAG Plans and Programs Technical Advisory Committee before being redistributed.
3. That the SCAG RCP Task Force recommended timeline for the draft 2008 Regional Comprehensive Plan be extended to address public comments and recommendations.
4. That the draft 2008 Regional Comprehensive Plan be amended throughout to reflect the voluntary nature of the document as a menu of policy and program options available for local governments and other stakeholders in the region. As a voluntary compilation of options, the 2008 Regional Comprehensive Plan should not be used as policy guidance for SCAG nor should it be used in any SCAG mandated program, including inter-governmental review.

As previously noted, the City of Irvine recognizes the importance of the draft 2008 RCP as a voluntary menu of policy and program options available for the region, but believes the document should not be adopted and implemented until these concerns and the technical comments and recommendations have been adequately addressed.

Sincerely,

A handwritten signature in black ink, appearing to read "Sean Joyce", with a stylized, flowing script.

Sean Joyce
City Manager

cc:

Hasan Ikharta, Executive Director, Southern California Association of
Governments, 818 West Seventh Street, 12th Floor, Los Angeles, CA 90017-
3435

Mr. Jacob Lieb
August 7, 2008
Page 3

Tracy Sato, OCCOG TAC Chair, City of Anaheim, 200 S. Anaheim Blvd.
Anaheim, CA 92805

Dennis Wilberg, OCCOG Interim Executive Director, City Manager, City of
Mission Viejo, 200 Civic Center, Mission Viejo, CA 92691

Gail Shiimoto-Lohr, GSL Associates, c/o City of Mission Viejo, 200 Civic Center,
Mission Viejo, CA 92691

Sean Joyce, City Manager

Wally Kreutzen, Assistant City Manager

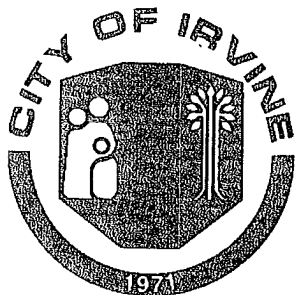
Sharon Landers, Assistant City Manager

Douglas Williford, Director of Community Development Department

Brian Fisk, Manager of Planning and Redevelopment

Bill Jacobs, Principal Planner

Marika Modugno, Senior Planner



BETH KROM, Mayor

www.ci.irvine.ca.us

City of Irvine, One Civic Center Plaza, P.O. Box 19575, Irvine, CA 92623-9575

(949) 246-2333

August 5, 2008

The Honorable Richard Dixon, President
Regional Council
Southern California Association of Governments
818 West 7th Street, 12th Floor
Los Angeles, California 90017-3435

Dear President Dixon:

I have reviewed the agenda for the August Community, Economic, and Human Development (CEHD) Committee meeting and wish to provide my comments and concerns with regard to item 5.1, the draft 2008 Regional Comprehensive Plan (RCP). I had hoped to be present at the CEHD Committee meeting, the Regional Council meeting, and the RCP Workshop; however, due to a local commitment, I am unable to attend and request that these written comments be provided to Committee members and be included in the meeting record for item 5.1.

It is my understanding that at its June 9, 2008 meeting, the RCP Task Force recommended several procedural steps to bring the process for developing the draft 2008 RCP to a close. Among those steps are the recommendation that the public comment period close on August 11, 2008 and that the RCP be considered for adoption at the September 4, 2008 Regional Council meeting. I recognize the importance of the draft 2008 RCP as a voluntary menu of policy and program options available for local governments and other stakeholders in the region, but strongly believe that a document of this comprehensive nature should be reviewed for technical accuracy and consistency before final approval.

WE are concerned that, the 2008 RCP and its policies will be incorporated into the ongoing mandatory Inter-Governmental Review (IGR) process, allowing SCAG to provide comments on plans and environmental documents of regional significance. Numerous plans and environmental documents for projects in the City of Irvine are considered regionally significant and, in the absence of an explicit disclaimer as to the voluntary nature of the RCP document, we anticipate they might be required to be consistent with the goals, policies, best management practices, and mitigation measures identified in the draft RCP, thereby undermining the voluntary nature of the RCP.

My concerns and comments are consistent with, and in support of, those expressed by the Orange County Council of Governments. I request that prior to adoption of the draft 2008 RCP, SCAG staff and the RCP Task Force address the following recommendations:

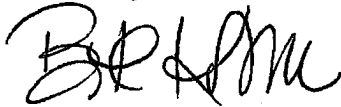
The Honorable Richard Dixon
 August 5, 2008
 Page 2

1. The draft 2008 Regional Comprehensive Plan should be reviewed and revised through a re-activated SCAG Plans and Programs Technical Advisory Committee before being re-distributed;
2. The SCAG RCP Task Force recommended timeline for the draft 2008 Regional Comprehensive Plan, including final adoption of the document, be extended to address public comments and recommendations; and,
3. The draft 2008 Regional Comprehensive Plan should be amended throughout to reflect the voluntary nature of the document as a menu of policy and program options available for local governments and other stakeholders in the region. As a voluntary compilation of options, the draft 2008 Regional Comprehensive Plan should not be used as policy guidance for SCAG nor used in any SCAG mandated program, including intergovernmental review.

In addition, we would respectfully request that SCAG staff and the RCP Task Force should address all technical comments and recommendations on the draft 2008 Regional Comprehensive Plan, as detailed in the comment letter from the Orange County Council of Governments distributed under separate cover.

Thank you again for the opportunity to provide my comments and concerns on the draft 2008 Regional Comprehensive Plan.

Sincerely,



BETH KROM
 Mayor

cc:

Hasan Ikharta, Executive Director, Southern California Association of Governments, 818 West Seventh Street, 12th Floor, Los Angeles, CA 90017-3435
 Tracy Sato, OCCOG TAC Chair, City of Anaheim, 200 S. Anaheim Blvd. Anaheim, CA 92805
 Dennis Wilberg, OCCOG Interim Executive Director, City Manager, City of Mission Viejo, 200 Civic Center, Mission Viejo, CA 92691
 Gail Shiimoto-Lohr, GSL Associates, c/o City of Mission Viejo, 200 Civic Center Mission Viejo, CA 92691
 Sean Joyce, City Manager
 Wally Kreutzen, Assistant City Manager
 Sharon Landers, Assistant City Manager
 Douglas Williford, Director of Community Development Department
 Brian Fisk, Manager of Planning and Redevelopment
 Bill Jacobs, Principal Planner
 Marika Modugno, Senior Planner

DENNIS R. YATES
Mayor

EUNICE M. ULLOA
Mayor Pro Tem



GLENN DUNCAN
EARL C. ELROD
TOM HAUGHEY
Council Members

PATRICK J. GLOVER
City Manager

CITY of CHINO

July 31, 2008

Mr. Jacob Lieb
Program Manager
Southern California Association of Governments
818 West 7th Street, 12th Floor
Los Angeles, CA 90017

RE: 2008 Regional Comprehensive Plan

Dear Mr. Lieb:

Thank you for providing the City of Chino an opportunity to review and comment on the Draft 2008 Regional Comprehensive Plan

Based upon staff's review of the plan, the City of Chino has the following comments:

Open Space and Habitat – Natural Lands

OSN-12 – Please provide additional information on how consistency with open space conservation policies and goals will be determined. Additionally, please provide information on which funding opportunities and programs are envisioned to be dependent on conformance with this policy.

Transportation

TR-1S – This initiative states that SCAG, transportation commissions, local governments, and other project proponents should use the Compass Blueprint to influence the funding of future transportation planning and investments. How would this be structured to fairly benefit agencies both within and outside the boundaries of the Compass Blueprint?

Thank you again for providing the City of Chino the opportunity to review the subject document. Should you have any questions, please feel free to contact me at (909) 464-8310.

Sincerely,


Brent Arnold
City Planner

cc: Charles E. Coe, AICP, Director of Community Development
Community Development Department File





August 11, 2008

Mr. Jacob Lieb
Program Manager
Southern California Association of Governments
818 West 7th Street, 12th Floor
Los Angeles, CA 90017

Via U.S. Mail and email to lieb@scag.ca.gov

Subject: Comments on the SCAG Draft 2008 Regional Comprehensive Plan

Dear Mr. Leib:

The City of Lake Forest would like to take this opportunity to echo the comments on the Draft 2008 Regional Comprehensive Plan (RCP) as submitted by the Orange County Council of Governments in its letter dated August 5, 2008. The City supports the recommendations made in the letter and would like to emphasize the request to amend the document "to reflect its voluntary nature as a menu of policy and program options available for local governments and other stakeholders in the region. As a voluntary compilation of options, the 2008 Regional Comprehensive Plan should not be used as policy guidance for SCAG nor should it be used in any SCAG mandated program, including intergovernmental review."

We appreciate the extensive public outreach conducted during the preparation of the Draft RCP as well as the opportunity to review and comment on the document. We also support the action taken by the Community, Economic and Human Development (CEHD) policy committee at its meeting on August 7, 2008 to bring RCP back to the CEHD policy committee for a full review at its September 4, 2008 meeting following the close of the public comment period.

Sincerely,
CITY OF LAKE FOREST

Gayle Ackerman, AICP
Director of Development Services

cc Robert C. Dunek, City Manager

Mayor
Mark Tetteimer

Mayor Pro Tem
Peter Herzog

Council Members
Richard Dixon
Kathryn McCullough
Marcia Rudolph

City Manager
Robert C. Dunek

Office of the City Council



August 6, 2008

The Honorable Larry McCallon, Chair
Community, Economic, and Human Development Committee
Southern California Association of Governments
818 West Seventh Street
Los Angeles, CA 90017-3435

SUBJECT: SCAG DRAFT 2008 REGIONAL COMPREHENSIVE PLAN

Dear Chair McCallon:

Thank you for the opportunity to provide comments on the Draft 2008 Regional Comprehensive Plan.

The City of Tustin supports the comments and recommendations made by the Board of Directors of the Orange County Council of Governments (OCCOG) on July 24, 2008, regarding the Draft 2008 Regional Comprehensive Plan (RCP). The OCCOG Board took the following actions:

- 1) Provided technical comments and recommendations on the Draft 2008 RCP;
- 2) Recommended that the Draft 2008 RCP be revised and reviewed through a reactivated SCAG Plans and Programs Technical Advisory Committee (TAC) before being redistributed;
- 3) Recommended that the review period for the Draft 2008 RCP be extended; and,
- 4) Recommended that the Draft 2008 RCP be amended throughout to reflect the voluntary nature of the document as a menu of policy and program options available for local governments and other stakeholders in the region; and that the documents not be used as policy guidance for SCAG nor in any SCAG mandated program, including intergovernmental review.

The City of Tustin is concerned that the voluntary measures and actions items in the RCP will essentially become mandatory if they are linked to proposed Senate Bill (SB) 375 and/or SB 303 and the proposed implementation of Assembly Bill (AB) 32. Also, it is possible that future transportation funding allocations could be tied to meeting the

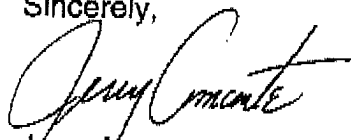
The Honorable Larry McCallon
August 6, 2008
Page 2

consistency requirements mandated by these bills. Therefore, the 2008 RCP should be clearly identified as a voluntary menu of optional measures and actions available to local governments and project proponents, and not as a vehicle to implement any requirements or mandates that may result from these pieces of legislation.

Given the complexity of the issues associated with the Draft 2008 RCP, the close of the public comment period on August 11, 2008, and consideration of adoption by the Regional Council on September 4, 2008, does not provide sufficient time to consider and discuss the comments that SCAG is likely to receive on the Draft 2008 RCP. The City of Tustin urges the Community, Economic, and Human Development Committee to recommend to the Regional Council that the comment period be extended and that the SCAG Plans and Programs TAC be reactivated and asked to thoroughly review the technical aspects of the Draft 2008 RCP.

Thank you again for the opportunity to provide comments on the Draft 2008 Regional Comprehensive Plan prepared by the Southern California Association of Governments. If you have any questions regarding our comments, please call Scott Reekstin, Senior Planner, at (714) 573-3016.

Sincerely,



Jerry Amante
Mayor

cc: The Honorable Richard Dixon, SCAG Regional Council President
The Honorable Pam O'Conner, Chair, SCAG RCP Task Force
The Honorable Cheryl Brothers, Chair, OCCOG Board of Directors
Mr. Hasan Ikhata, Executive Director, SCAG
Ms. Karen Hamman, OCCOG Interim Clerk of the Board
SCAG Regional Council
Tustin City Council

DEPARTMENT OF TRANSPORTATION

District 12

3337 Michelson Drive, Suite 380
Irvine, CA 92612-8894*Flex your power!
Be energy efficient!*

August 6, 2008

Ms. Jennifer Sarnecki
Senior Planner
Southern California Association of
Governments
818 West 7th Street 12th Floor
Los Angeles, CA. 90017File: Regional Planning
Regional Comprehensive Plan**Subject: Draft 2008 Regional Comprehensive Plan**

Dear Ms. Sarnecki,

Thank you for the opportunity to review and comment on the **Draft 2008 Regional Comprehensive Plan**. The Regional Comprehensive Plan (RCP) is a problem-solving guidance document that directly responds to what was learned about Southern California's challenges through the annual State of the Region report card. It responds to SCAG's Regional Council directive in the 2002 Strategic Plan to develop a holistic, strategic plan for defining and solving inter-related housing, traffic, water, air quality, and other regional challenges. The RCP will offer recommendations to local governments from a regional, comprehensive perspective for consideration into the development of local General Plans and the design and review of major development through the region's Intergovernmental Review process.

Caltrans District 12 has reviewed this document and has the following comment.

Caltrans supports our stakeholders who endeavor to develop a holistic, strategic plan that through a collaborative process address inter-related regional challenges:

- Land Use and Housing,
- Open Space and Habitat,
- Water
- Energy
- Air Quality
- Solid Waste
- Transportation
- Security and Emergency Preparedness,
- Economy

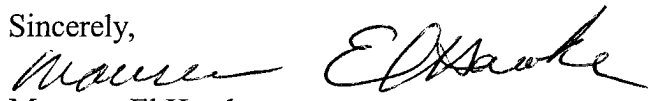
"Caltrans improves mobility across California"

Ms. Sarnecki
August 6, 2008
Page 2

The RCP recommends more integrated resource planning, which responds to a Caltrans Blueprint Planning Program goal, to foster a more efficient land use pattern that (a) supports improved mobility and reduced dependency on single-occupant vehicle trips, (b) accommodates an adequate supply of housing for all incomes, (c) reduces impacts on valuable habitat, productive farmland, and air quality, (d) increases resource use efficiency, and (e) results in safe and vibrant neighborhoods.

We appreciate the opportunity to comment on this document. If you have any questions or need to contact us, please do not hesitate to call Aileen Kennedy at (949) 724-2239.

Sincerely,

A handwritten signature in black ink, appearing to read 'Maureen El Harake', written in a cursive style.

Maureen El Harake,
Chief of Advanced Planning Branch
District 12



BOARD OF DIRECTORS

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Arthur T. Leahy
Chief Executive Officer

August 11, 2008

Mr. Hasan Ikhata
Executive Director
Southern California Association of Governments
818 West Seventh Street, 12th Floor
Los Angeles, California 90017-3435

Dear Mr. Ikhata:

Thank you for the opportunity to offer the Orange County Transportation Authority's (OCTA) comments on the Southern California Association of Government's (SCAG) draft 2008 Regional Comprehensive Plan (RCP). OCTA believes the 2008 RCP will be a useful resource for developing strategies to address the issues facing the SCAG region in the coming years.

OCTA staff has reviewed the draft RCP and identified the following concerns:

General RCP Comments

OCTA has reviewed the RCP with the understanding that it is a completely voluntary, advisory document that comprises previously adopted SCAG policies and initiatives.

The RCP document should clearly state that SCAG does not intend to use the RCP to comply with existing or future State requirements. If the State should require a "blueprint" or "sustainable communities strategy" to be developed and adopted by SCAG, an entirely new document should be developed based on updated local input and close consultation with subregional councils, local agencies, County Transportation Commissions (CTCs), and the general public.

OCTA notes that technical and vague terminology is used throughout the RCP. These terms should be more clearly defined to improve clarity. In addition, references to the 2008 Regional Transportation Plan (RTP) that imply that it will be adopted subsequent to the RCP should be omitted.

Transportation Chapter

Please clarify that the land-use policies and strategies in the RCP are advisory. Also, text throughout this chapter that reflects issues discussed in the RTP should correspond more closely with the language used in the RTP.

The proposed strategy to maximize the use of market-based incentives to reduce vehicle miles traveled should also note that the market-based incentives can be used to manage congestion, thereby, reducing vehicle hours of delay (VHD). Moreover, the discussion of Transportation Outcomes should also include reducing VHD as a measure of success for meeting the Transportation Goals.

The Strategic Initiative stating that project proponents should use the Compass Blueprint to influence funding for future transportation plans and investments causes concern. At most, project proponents should be asked to "consider" the Compass Blueprint, rather than be asked to "use" it. Otherwise, this Strategic Initiative should be omitted.

Energy Chapter

The discussion regarding SCAG influencing future fuel demand by prioritizing funding for energy efficient transportation projects is too strong. This language should be altered to clarify that CTCs and local agencies are encouraged to consider prioritizing funding for energy efficient transportation projects.

Air Quality Chapter

The discussion regarding use of the RCP to prioritize funding for projects causes concern. This language should be altered to clarify that CTCs and local agencies are encouraged to consider RCP principles when prioritizing funding for projects.

The Air Quality Action Plan refers to "electrification" under AQ-2.3. It is unclear what is meant by this; however, it is assumed to be in reference to rail electrification. This should be omitted, since no such projects are included in the RTP.

Land Use Chapter

Under the Land Use Action Plan, it is recommended that CTCs initiate a program to "secure significant resources" for implementing Compass Blueprint. The definition of "specific allowable costs" is unclear, and there is no precedent for OCTA funding such projects. Furthermore, transportation dollars have limited applications, which do not include land use entitlement projects. This strategic initiative should be omitted.

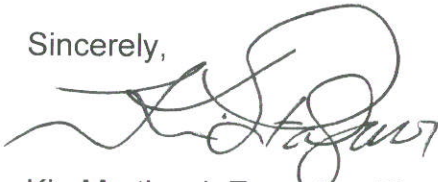
Open Space & Habitat Chapter

In the Open Space and Habitat – Natural Lands Action Plan, it is unclear how the correlation between a transportation project and growth would be determined. Transportation projects are generally demand driven, responding to growth or planned growth. Based on the language in this policy, it appears that impacts could be unjustly attributed to transportation projects. This policy should be omitted.

The Action Plan also suggests that open space should be preserved using a one-to-one ratio. The phrase "open space" is too broad, and could suggest that even brownfield developments should preserve open space. This type of mitigation is usually reserved for specific environments and habitats that are key to the preservation of endangered or threatened species, or species of special concern. Furthermore, the decision to preserve open space, and the ratio of preservation (i.e. one-to-one), is determined on a project-by-project basis, not as a blanket policy. This policy should be omitted.

OCTA appreciates SCAG's work to date, and looks forward to the adoption of the 2008 RCP. If you have further questions, please contact Michael Litschi at (714) 560-5581 or Gregory Nord at (714) 560-5885.

Sincerely,

A handwritten signature in black ink, appearing to read "Kia Mortizavi", with a stylized flourish at the end.

Kia Mortizavi, Executive Director
Development

KM:gn

August 11, 2008

Mr. Hasan Ihkrata
Executive Director
Southern California Association of Governments
818 W. Seventh Street, 12th Floor
Los Angeles, CA 90017

Re: Draft 2008 Regional Comprehensive Plan Comments

Dear Mr. Ihkrata,

The Building Industry Association of Southern California (BIA/SC) has reviewed the draft Regional Comprehensive Plan and offers the following comments. BIA/SC is a non-profit trade association which represents the building industry in the counties of Los Angeles, Riverside, Orange, Ventura, San Bernardino and Imperial.



**Building
Industry
Association
of Southern
California**

1330 South Valley Vista Drive
Diamond Bar, California 91765
909.396.9993
Fax: 909.396.1571
<http://www.biasc.org>

Overview

- The Regional Comprehensive Plan (RCP) is a document that will have serious impacts on both the public and private sectors. While it has been repeatedly described as an "advisory document"¹ it is also being described as a new policy document that will be incorporated into SCAG's Intergovernmental Review Process². We believe the RCP should not be incorporated into SCAG's Intergovernmental Review process. When SCAG provides comments on projects of regional significance, those comments must be based on adopted Regional Council policies. Given the extreme lack of detail in the RCP, it should be used as a voluntary guidance document and not be used as part of SCAG's Intergovernmental Review Process.
- If used by SCAG in the Intergovernmental Review Process, the comments submitted to the Lead Agency must be responded to by the Applicant. The broad-based objectives that have not received technical review will dramatically increase the number of lawsuits that local government and project proponents will face in their land-use planning.
- Under SB 375 and AB 32 a regional plan will be developed. SCAG should not move forward with the draft RCP at this point, as the fundamentals of those plans should come from city/county level and then be incorporated into SCAG's document. This draft RCP was created using a top down approach.

¹ CEHD staff report dated August 7, 2008

² CEHD staff report dated August 7, 2008

Antelope Valley Chapter
Baldy View Chapter
Desert Chapter
L.A./Ventura Chapter
Orange County Chapter
Riverside County Chapter

Land Use and Housing Chapter

- No chapter more clearly illustrates the inherent challenges that are derived from a regional policy document. It is our belief that the one-size-fits-all approach, as outlined in this chapter, is unreasonable.
- A great deal of emphasis is placed on the Compass Blueprint Growth Vision (Compass). As proposed the RCP would formally adopt the heretofore voluntary Compass program as the policy whereby SCAG would provide intergovernmental review comments. The building industry questions the validity of the Compass program as a model. Referred to as the “2% Strategy,”³ the program has never clearly defined its desired goals. SCAG should reevaluate the program, indicating which cities and counties would be affected and expected to make land-use changes based on the “2% strategy.” Is the premises that 2% of all local governments within the SCAG region would be affected, or is it that 2% of the total land area with SCAG’s regions, most of which is considered undevelopable would be impacted?
- The draft RCP suggests that housing growth should be targeted towards existing and planned transit stations⁴. Given the lack of housing stock in our region, to place an emphasis on housing located near or adjacent to a transit facility, of which there are very few located within the nearly 25 million acres of the SCAG region. Therefore such restrictions would severely impact housing affordability. The RCP should encourage the development of more housing opportunities throughout Southern California’s communities in order to positively impact housing affordability.
- The RCP should not make statements that have not been defined. Local communities are best situated to determine their land-use needs. SCAG should not advocate for the protection of “important open space” or “environmentally sensitive areas”⁵. Open space comes in many forms, i.e., greenbelts, cemeteries, water bodies, etc. Decisions regarding open space and environmental sensitive areas should not be interpreted at the regional level. The use of ambiguous terms in the RCP will lead to a dramatic increase in litigation, for both the applicant and local government.
- Housing supply remains an important issue in Southern California. To establish an artificial measurement such as one housing unit for every 3 persons in population growth and one housing unit for every 1.5 jobs⁶ would eliminate the flexibility that are required by local governments to make sounds and prudent land-use decisions. If the RCP is to be used for intergovernmental review comments, would SCAG be reviewing projects and recommending to local governments the approval or disapproval of housing units (through the intergovernmental comment process) based on regional, sub-regional or city growth

³ Land Use and Housing Chapter page 16

⁴ Land Use and Housing Chapter page 17

⁵ Land Use and Housing Chapter page 17

⁶ Land Use and Housing Chapter page 18

projections? We believe SCAG should not make recommendations based on any formula. Local housing decisions should remain at the discretion of locally elected officials, and SCAG should not attempt to thwart those decisions or provide additional opportunities for litigation based on a regional policy.

- The cost of housing has long been a concern to the building industry. The draft RCP notes a goal of reducing by 20% the number of households that pay more than 50% of their income for housing and transportation costs⁷. A major contributing factor to the cost of housing is mandated government fees. The RCP should note the effect that fees have on housing affordability.
- Housing vacancy rates vary greatly based on a number of factors including size, location and amenities associated with the unit. Regional vacancy rates as outlined in draft RCP⁸ will be interrupted as a control method for certain type of housing projects and should be removed from the RCP. The vacancy rates in a local community will dramatically differ from that of the region and therefore an artificial threshold is not advisable.
- As indicated in the draft RCP, housing supply and not kept pace with demand. The building industry believes that residents of Southern California should not be limited in their housing choices. Given the large diversity of families and their housing preferences, the RCP should not overlook housing choice as a priority. By suggesting a reduction in land being used for housing⁹, SCAG will be limiting choice for families in our region of prefer to live in what is considered a rural environment.
- The State of California has recently adopted the first of its kind state-wide Green Building Standards¹⁰. SCAG should encourage local governments to build to the standards that have been reviewed and approved by the state, in –lieu of suggesting each jurisdiction to adopt their own standards for construction¹¹. By implementing the green building standards adopted by the state, construction costs can be better maintained therefore impacting housing affordability.

Open Space and Habitat

- SCAG is primarily charged by the federal government in planning for our region's future transportation needs. Yet the Transportation Chapter is one of the smallest, if not the smallest chapter in the draft RCP. Open Space and Habitat being the largest. We believe that SCAG should review its primary mission and focus more on transportation related issues.

⁷ Land Use and Housing Chapter page 18

⁸ Land Use and Housing Chapter page 18

⁹ Land Use and Housing Chapter page 18,19

¹⁰ California Building Standards Commission, July 2008

¹¹ Land Use and Housing Chapter page 19

- We believe SCAG should once again focus on its core competency – transportation planning. The Open Space and Habitat Chapter clearly would indicate SCAG's desire to focus more of its attention on local land-use decisions. We do not believe SCAG should spend its limited resources on land acquisition services for private non-profit organizations or identifying potential sources of funding for land preservation¹². Open space determinations should not be included in SCAG's intergovernmental review process.

Water Chapter

- We believe new development alone should not be held responsible for the region's water quality goals. Regional approaches should be evaluated by the Regional Water Quality Control Boards within SCAG's territory.
- Flood protection and public safety is critical to our region. Impervious surface decisions¹³ should only be considered at the local level, as watersheds vary greatly throughout Southern California. In many cases water must be removed from an area quickly in order to protect lives and property.

Air Quality Chapter

- Given our region is home to two deep water ports, Ports of Los Angeles and Long Beach, we participate in the benefits and the drawbacks that accompany those job generating activities. Understanding that the predominant share of emissions in our region result from activities that are regulated by the Federal government, SCAG should continue to advocate stronger regulations on mobile sources, and not unduly suggest additional restrictions on land-use. We support good planning, which takes into consideration transportation infrastructure; however it should not be the sole factor on which land-use decisions are based.
- The draft RCP recommends that residential development is incompatible with freeways¹⁴. We believe locating residential and other types of development near existing transportation infrastructure, whether it is light rail, subway, and/or highways, in some cases can reduce emissions from mobile sources, thereby enhancing air quality.
- The messages contained in the Land Use and Housing Chapters can be viewed as inconsistent with those in Air Quality. While the RCP suggests condensed development, buffers are suggested between uses in the Air Quality Chapter¹⁵. This disparity illustrates the needs for flexibility at the local level when making land-use decisions, again highlighting the challenges that would be faced in the intergovernmental review process.

¹² Open Space and Habitat Chapter page 26

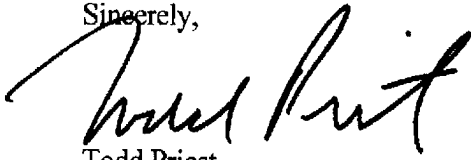
¹³ Water Chapter page 56

¹⁴ Air Quality Chapter page 83

¹⁵ Air Quality Chapter page 84

Thank you for considering our viewpoints.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd Priest". The signature is fluid and cursive, with a large initial "T" and a stylized "P".

Todd Priest

Building Industry Association of Southern California



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August 11, 2008

Pablo Gutierrez
Southern California Association of Governments
818 West 7th Street, 12th Floor
Los Angeles, CA 90017

Re: Public Comments on the Draft Regional Comprehensive Plan

Dear Mr. Gutierrez:

I. Overview

We commend the Southern California Association of Governments (SCAG) for calling for a multi-agency approach to improve access to parks, in particular among low income communities of color, and transit to parks, in the Environmental Justice Report of the Regional Transportation Plan adopted May 8, 2008.

We urge SCAG to continue its leadership in this area by present a region-wide vision and strategic plan for southern California to alleviate inequities in access to green space and transit in the final Regional Comprehensive Plan (RCP). SCAG should also articulate its commitment to respectful government to government consultation between local governments and tribal nations in the final RCP.

The City Project is a multicultural policy and legal advocacy organization that is working to broaden access to parks and open space, especially in underserved communities, and to fight childhood obesity by guaranteeing that students get enough physical education.

Providing equitable transportation and land use planning for the region is good policy – and good law. Federal and state laws prohibit both intentional discrimination and unjustified discriminatory impacts for which there are less discriminatory alternatives in the provision of public resources. An important purpose of the statutory civil rights framework is to ensure that recipients of public funds do not maintain policies or practices that result in discrimination based on race or ethnicity. The California statutory definition of Environmental Justice requires “the fair treatment of people of all races, cultures, and incomes.” The SCAG RCP can proactively achieve compliance with civil rights, environmental, and other laws by incorporating our recommendations into the final document. *See Robert García and Aubrey White, Healthy Parks, Schools and Counties: Mapping Green Access and Equity for California* at 9-10.

Part II addresses SCAG’s call for a multiagency approach to improve access to parks and recreation in the Regional Transportation Plan adopted in May 2008. Part III discusses the disparities in access to parks and recreation throughout the Los Angeles region and California. Part IV offers Transit to Trails as a best practice example to address these disparities in Southern California. Part V discusses joint use agreements as a means to promote healthy parks, schools,

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and communities. Part VI addresses the historic treatment of California Indian tribes and the existing laws created in part to address this historic treatment. Part VII recommends the inclusion of ten environmental justice principles in the final RCP.

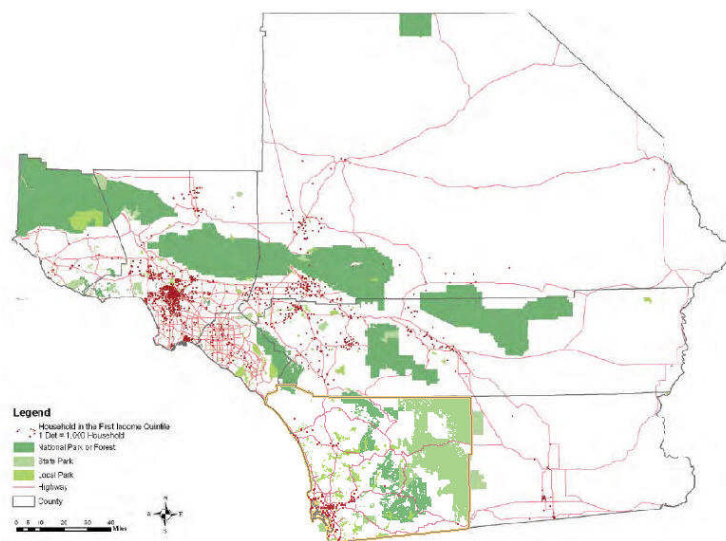
II. SCAG's Regional Transportation Plan Calls for a Multiagency Approach to Alleviate Disparities in Access to Parks and Recreation

We commend SCAG for including a discussion on the need to improve access to park space, in particular among low income communities of color, public transportation to park space, and the need for a multi-agency approach to address these inequities in the Supplemental Environmental Justice Report of the Regional Transportation Plan adopted May 8, 2008.

“Public parks serve all residents. . . . However, not all neighborhoods and people have equal access to these public resources,” including local, state, and national parks. “[A] multi-agency effort must be undertaken in order to further address and remedy the issue of inequity of park access.” “Research has found a complete lack of public transportation services into National Parks, but this also appears true for State Parks. There is almost no access to national parks and very limited access to state parks by transit across all income groups” SCAG RTP Environmental Justice Report 11-14, 20 (2008).

The following map shows the unequal distribution of parks and low income neighborhoods in the Southern California counties of Los Angeles, Ventura, San Bernardino, Riverside, Imperial, and San Diego.

MAP 1: DISTRIBUTION OF PARKS AND LOW-INCOME HOUSEHOLDS



Source: Southern California Association of Governments, ESRI StreetMapUSA, TeleAtlas.
Park and income data for San Diego County added by The City Project and GreenInfo Network. The household income figure for San Diego County is \$19,999 or less, which is commonly available from the Census Bureau. The map and all other data are from the SCAG RTP Environmental Justice Report 11-14 (proposed final May 8, 2008). SCAG used a household income figure of \$19,360 for the counties besides San Diego.

We urge SCAG to continue its leadership in this area by present a region-wide vision and strategic plan for southern California to alleviate inequities in access to green space and transit in the final Regional Comprehensive Plan (RCP). SCAG should also articulate its commitment to

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respectful government to government consultation between local governments and tribal nations in the final RCP.

III. Unfair Disparities in Access to Parks and Recreation

The City Project has extensively documented the unfair disparities in access to parks and recreation, and has proposed principles and programs such as Transit to Trails to achieve equal access for all. *See, e.g.,* Robert García and Aubrey White, *Healthy Parks, Schools, and Communities: Mapping Green Access and Equity for the Los Angeles Region* (2006) (“*HPSC for the Los Angeles Region*”). The Report is available on the web at www.cityprojectca.org/ourwork/mappinggreenaccess. Children of color living in poverty with no access to a car in Los Angeles suffer from the worst access to parks, large schools fields, mountains, trails, beaches, and other natural public places and suffer from the highest levels of child obesity. These children and their families and friends do not have access to cars or a decent transit system to take them to parks, schools, and other natural public places. Disproportionately white and wealthy people with fewer children than the county average enjoy the best access to parks, school fields, mountains, trails, beaches, and transportation. In a cruel irony, those who need the most have the least, and those who need less have the most. *Id.*

Four of the six SCAG counties are among the eight counties in the state with the greatest need for green space – in combined terms of the fewest acres of green space per thousand residents, and highest levels of child obesity, youth, poverty, and people of color. These facts are illustrated and analyzed in the accompanying Policy Report by Robert García and Aubrey White, *Healthy Parks, Schools and Counties: Mapping Green Access and Equity for California* at pages 3-6, Map 1, and Tables 9A-9F.

IV. Transit to Trails is One Remedy to Alleviate Disparities in Access to Parks and Recreation

Southern California should develop and implement a strategic plan for a “Transit to Trails” program to take people to parks, beaches, forests, lakes, and other public natural spaces. A Transit to Trails program would serve all the people of the region, but would be particularly useful to the working poor with limited or no access to cars, who are disproportionately people of color and low income. Transit to Trails would reduce traffic congestion and parking problems, improve air quality, and reduce run-off of polluted water into rivers and the ocean. It would also reduce dependency on the automobile and fossil fuels.

Today, there is virtually no good way to reach the four Southern California forests using public transportation. Transit to beaches is limited, time-consuming, and expensive. Low cost transit service should link great urban parks with outlying green space. SCAG has the opportunity to include Transit to Trails as a best practices example of a multi-agency region-wide approach to combat disparities in access to parks and recreation in its Regional Comprehensive Plan.

The Mountains and Recreation Conservation Authority, Anahuak Youth Association, and The City Project launched a successful Transit to Trails pilot program in 2007. Transit to Trails takes inner city youth and their families and friends on fun mountain, beach, and Los Angeles River

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trips. The project enriches their education about water, land, wildlife, and cultural history, and the importance of physical activity and healthy eating for life-long health.

In April 2007, Secretary of the Interior Dirk Kempthorne joined Anahuak youngsters for a hike to celebrate National Junior Ranger Day in the Santa Monica Mountains National Recreation Area. Although these children live only an hour from the mountains and beaches, many have never been there, because parents often work two or more jobs, and do not have access to cars or to information to plan trips. We are diversifying access to and support for mountains, beaches, and rivers -- and having fun doing it!

This successful partnership can serve as a best practice example that can be implemented throughout the region. The SCAG RCP should encourage local governments to adopt the multi-agency cooperative model of the pilot Transit to Trails program.

V. Joint Use of Parks, Pools, and Schools

We commend and support SCAG for recognizing the need for the joint use of parks, schools, and pools to create healthy, livable communities for all. *SCAG Draft Regional Comprehensive Plan at 138-142*. We recommend that the RCP call for master joint use agreements between each city and school district in the SCAG region, including the City of Los Angeles and the Los Angeles Unified School District.

There are unfair school, park, and health disparities in southern California. For example, only 103 out of 605 LAUSD schools have five acres or more of playing fields, and those tend to be located in areas that are disproportionately white and wealthy and have greater access to parks. LAUSD provides 71% more play acres for non-Hispanic white students than for Latino students in elementary schools. There were only 30 joint use agreements between LAUSD and the City of Los Angeles Recreation and Parks Department as of April 2006. *HPSC for the Los Angeles Region at 9*.

The health implications of the lack of places to play in parks and schools are profound. In California, 73% of fifth, seventh, and ninth graders did not achieve minimum physical fitness standards in 2004. In LAUSD, 87% of students were not physically fit. Yet in 2006, 51% of school districts in California, including LAUSD, did not enforce statutory physical education requirements. At LAUSD's South Gate High School, 1,600 children took the state Fitnessgram test and not one passed. Forty schools did not have a single physically fit student. Less than 10% of students were physically fit in nearly one-third of the 605 schools in LAUSD. Only eight schools had student populations that are more than 50% physically fit. *Id.* at 9.

Schools should serve as centers of their communities, with playgrounds and playing fields open after school and on weekends. The shared use of parks and schools can alleviate the lack of places to play and recreate, while making optimal use of scarce land and public resources.

VI. SCAG's RCP Should Include a Commitment to Respectful Government to Government Consultation with California Tribes

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While we commend the RCP in many respects, this document fails to highlight the importance of respectful government to government consultation between local governments and California Tribes.

The State of California has a history of laws that prohibited California Indians from practicing their religion, speaking their languages, and practicing traditional ceremonies and customs, according to the California State Library Research Bureau. State laws separated California Indians from their lands, and separated at least a generation of children and adults from their families, languages, and cultures, Kimberly Johnston-Dodds, *Early California Laws and Policies related to California Indians* (California Research Bureau, California State Library 2002).

Today, California law promotes respectful government to government consultation with California Indian tribes regarding land use planning that may impact traditional cultural properties, in part, to counter the devastating impacts of state and federal historic treatment of California Indians.

SB 18 and the tribal consultation guidelines published by the Office of Planning and Research require agencies to consult with Indian Tribes. California law also requires government to government consultation prior to designation of land as open space by local governments.

The SCAG RCP Open Space and Habitat Chapter should include a discussion on SB 18 and best practices examples of consultation between local governments and tribes. The SCAG RCP should include a discussion of the relevant cultural resource protection and tribal consultation laws and strategies for improving dialogue between tribal nations and local governments.

VII. Conclusion

The values at stake in providing equitable transportation and land use planning for the region include promoting the simple joys of playing in the park; human health; youth development and academic performance; conservation values of clean air, water, and land, habitat protection, and climate justice; economic vitality for all; spiritual values in protecting people and the earth; cultural and historical values at parks such as San Onofre State Beach; and sustainable regional planning. Fundamental principles of equal justice and democracy underlie each of these other values. See Robert García and Aubrey White, *Healthy Parks, Schools and Counties: Mapping Green Access and Equity for California* at 7-9.

The SCAG RCP should present a region-wide vision and strategic plan to alleviate real and perceived inequities in access to green space and transportation. The principles below in many respects present the necessary framework.

Principle 1. Transportation resource decisions have widespread impacts on health, housing, development, investment patterns, climate justice, and quality of life. The process by which those decisions are reached, and the outcomes of those decisions, must be fair and beneficial to all.

Principle 2. Transportation investments should be guided by a regional vision that includes a comprehensive web of communities, parks, schools, beaches, forests, rivers, mountains, and

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transit to trails to achieve results that are equitable; promote human health, the environment, and economic vitality; and serve diverse community needs.

Principle 3. Infrastructure areas should be planned together in complementary rather than conflicting ways to serve health, education, human service, and environmental needs; to fulfill critical governmental and societal responsibilities; and to produce equitable results. For example, transit can provide access to trails.

Principle 4. Transportation priorities should be thoroughly assessed through an equity lens. For example, there are unfair disparities in transportation access, green space, and child obesity.

Principle 5. Employment, economic, and environmental benefits associated with building and maintaining transportation infrastructure should be distributed fairly among all communities. Local jobs with livable wages should go first to local residents. Job training should be provided for those who need it to qualify for jobs. There should be a level playing field for small, women, and minority business enterprises.

Principle 6. Revenues to support transportation improvements should be collected and allocated to distribute fairly the benefits and burdens of the projects. Resources should be targeted to the most underserved communities to overcome unfair disparities.

Principle 7. Transportation infrastructure decision-making should be transparent and include mechanisms for everyone to contribute to the planning and policymaking process.

Principle 8. Standards for measuring equity and progress should be articulated and implemented to guide planning and investments, and to hold agencies accountable.

Principle 9. In making transportation investments and decisions, recipients of federal and state funds including SCAG should proactively comply with federal and state laws designed to achieve equal access to public resources, including Title VI of the Civil Rights Act of 1964 and its implementing regulations, California Government Code 11135, and the California statutory definition of environmental justice. Compliance with civil rights, environmental, and other laws should be combined.

Principle 10. Government agencies including SCAG should dedicate resources to enable community based organizations to serve their communities and actively participate in infrastructure planning and investments.

We look forward to working with you to accomplish these goals.

Sincerely,

Robert García
Executive Director and Counsel

Angela Mooney D'Arcy
Program Consultant



"In a time of drastic change, it is the learner who will inherit the future."
Eric Hoffer

August 1, 2008

Hasan Ikhata
Executive Director
SCAG
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12th Floor
Los Angeles, CA 90017-3435
(213) 236.1800
www.scag.ca.gov

Re: Draft 2008 Regional Comprehensive Plan Evaluation & Recommendations

The Draft 2008 Regional Comprehensive Plan (RCP) addresses our region's challenges and solutions; but it does not chart a visionary and bold pathway for Southern California's global future to combat climate change and win our energy independence in the 21st century.

Southern California is the gateway to Asia Pacific and the front door to America in the Pacific Century, which is the biggest economic century in the history of mankind.

We are facing global mega threats: from global warming to global terrorism; from the world oil peak to the end of cheap oil; and from our continuing resource wars to the Middle East wars that have adversely impacted our economy and our quality of life.

Thus, we must rethink, replan, redesign and reengineer our economy to meet these global challenges in the 21st century with a bold Green Action Plan.

Southern California should become the epicenter of the Global Green Economy and should plan on building Green Technology Innovation Clusters to combat climate change in the Century of the Pacific.

The RCP must clearly articulate the vision of our region's transition from the "gray economy" constructed around the automobiles, freeways, and oil to a



“green economy” planned around our digital technologies i.e., (computers, and cell phones), the Internet Superhighway, and renewable energy technologies.

Southern California must lead the **solar revolution** by taking advantage of our infinite solar energy supply. This would spark the **second silicon revolution** that integrates the information technology (IT chips) and green technology (solar cells) to create a sustainable smart future in the Digital Age and the Solar Century.

Green Technology Innovation Initiative

We must establish green technology and bioscience clusters throughout the region.

This shift would combat the threat of climate change as well as be able to expand exports of clean technology products and services throughout the world.

We must also take advantage of our superior research and development technology capabilities from our universities and colleges while establishing a “green brain trust” for the region.

A good example is to work with NASA/JPL to bring to earth these sustainable technologies developed for the International Space Station to save Spaceship Earth.

Green Collar Workforce Initiative

During the “Dotcom Revolution” we did not prepare our students in the subjects of math, science and technology in order for them to take advantage of the IT jobs in Silicon Valley.

The U.S. Congress passed special legislation to welcome thousands of foreign workers from Asia and India to fill these high paying jobs.

In the coming “Green Revolution,” we need to teach and train our students to take advantage of the opportunities and possibilities of these new job opportunities.

We must educate a “green collar workforce” to meet the future job opportunities in all of the disciplines from environmental justice, green architecture, holistic health and medicine to installation of solar photovoltaic panels. Our children



must be versed in math, science and technology in order for them to compete and succeed in the 21st century global workforce.

Energy Independence Initiative

We must establish a regional Energy Independence Initiative and follow visionary leaders such as S. David Freeman, Al Gore and T. Bones Pickens' call to action.

There should be a regional Municipal Solar Program (MuniSolar), a private-public partnership for the SCAG cities to make the installation cost of photovoltaic panels very affordable.

The MuniSolar Program will combine the region's bulk buying power in order to drive down the installation cost of solar photovoltaic panels on public facilities.

The private sector will take advantage of all the tax credits and depreciation allowances. The public sector should work with the State Treasurer's office on green bond financing that is being proposed and with the California Public Utilities Commission's programs such as "net metering", "feed-in tariffs," "community choice aggregation," etc

Green Digital Village Development Initiative

Regional planners must establish land use policies that will incentivize smart growth developments that are "wifi" connected, transit ready, multigenerational, multiethnic, and multi-income communities.

We must include plans for housing returning Iraq War veterans, especially ones that are handicapped with special needs.

We must build clusters of digital green villages (green e-villages) where one can live, work, play, learn, shop and care for each other and the environment as well as create a sense of place.

These green e-villages should be wired to educate and empower its residents to become entrepreneurs and/or be able to telecommute to work in the digital age.

Since we have more information at our finger tips than the president of IBM had five years ago, we are living in the age of empowerment and entrepreneurialism. We must empower the people to go after the American Dream.

Digital World Trade Center Initiative



Just as Marco Polo opened the “Silk Road” to China to promote international commerce, we are opening the “Silicon Superhighway” to the Global Villages to conduct e-commerce, e-learning, telemedicine, telecommuting, and even tele-banking.

We are living in a “flat world” as described by Thomas Freidman, author of “The World is Flat.”

Today, you don’t have to be in downtown Los Angeles, Tokyo or New York to do international commerce; we can establish “digital world e-trade centers” in every SCAG city by connecting to the trade information network of the U.S. Department of Commerce.

The strength and asset of Southern California is in its diversity of our population.

In the digital age we are able to connect to our relatives, friends and business partners throughout the world almost instantly. Huge trading firms will become models of the pass, while our small, agile social networking entrepreneurs will become the future strategy for trading.

Earthquake Emergency Preparedness Initiative

The recent 5.2 earthquake originated from Chino Hills is a wakeup call to prepare for the Big One, not if, but when it hits the region. Most residents are in denial that they won’t be a victim of the massive earthquake that will devastate Southern California.

Unlike Katrina where they had 3 days notice and 30,000 residents without power, when the Next Big One hits Southern California, we will have 3 seconds notice and over 3+ million people without water and power for months.

The CRP should advocate that all schools and public facilities should be outfitted with solar energy and backup batteries. Schools and public parks will become the gathering centers for our neighborhoods. Therefore, we must organize and train a “community corps” response team to be able to provide assistance to people in need in order to contact the first responders, i.e. fire, police, medical, etc.

Food Security and Safety Initiative



Food safety and quality are becoming major health issues along with food security and the rising cost of fresh produce.

During WW II, there was a Victory Garden movement that encouraged people to grow their own fresh fruits and produce i.e., oranges, lemons, tomatoes, peppers, bean, etc. Today, there is a growing movement for urban gardens and farmers markets throughout the region. We need to encourage home vegetable gardens and composting to reduce solid waste materials.

With new innovative NASA technology such as “aeroponics” (without soil) as well as innovative multi-level hydroponics (with water), we could begin to improve the quality of our food supply, create local jobs and secure our food supply.

Subregion Initiatives: Green Valley Initiative

The Green Institute for Village Empowerment, Inc., (www.Giveforthefuture.org) a non profit public benefit organization has launched a Green Valley Initiative (www.GreenValleyNow.org) to establish the Inland Empire as California’s International Green Technology Center.

This center will combat climate change and create a jobs-housing balance strategic plan.

The Green Valley Initiative should become part of the 2008 Regional Comprehensive Plan in order to assist in developing a Subregion Comprehensive Plan for the Inland Empire.

The future of Southern California will be determined by how we plan for the population growth and manage the jobs-housing balance challenge; in the development of new suburban communities.

The Green Valley encompasses two counties, Riverside and San Bernardino, 52 cities, and covers over 27,000 square miles of land area.

The Inland Empire is the fastest growing region in California. In the next 20 years, it will grow to over 2 million people and by 2050; the population is projected to be over 8.4 million from the current 4.2 million people.

For over two decades, the Inland Empire led the way for green technology innovation and developments to flourish with solar, wind, and geothermal energy resources.



The solar thermal electric farm at Kramer Junction has been generating green power for over two decades.

The Heliostat Solar Farm in Barstow is an innovation in solar electric power generation.

The wind farms in the Coachella Valley and the geothermal farms in the Salton Sea region are producing power at a competitive rate compared with coal.

Fresh water supply will become a major factor in the future development of the Inland Empire. The Diamond Valley Lake in Hemet is the largest manmade lake in California and a critical asset in the future growth of the region.

The Green Valley Initiative has positioned the Inland Empire to take the leadership role in developing California's green technology industrial infrastructure. It has a superior logistical network by air, rail and trucks to accommodate the containers from the Ports of Los Angeles and Long Beach.

Over 41 per cent of all imports to the U.S. through the Ports of Los Angeles and Long Beach pass through the Inland Empire. It has large available industrial land at three former military bases and an affordable workforce that is being trained to become part of the Green Collar workforce.

A Subregion Comprehensive Regional Plan for the Green Valley Initiative is crucial for the overall economic and physical health of Southern California.

Many of the problems created by the imbalance of jobs-housing and lack of smart growth planning will result in more traffic congestion, air pollution, stress, cancer and other environmental problems. Oftentimes we are addressing the symptoms and not the cause of the problems.

We must rethink our strategic plan in the Green Economy and in the Digital Age. The Inland Empire has the potential and opportunity to plan the Next Suburb as a model for creating a sustainable future by balancing the economic, social and environmental needs of its people.

Conclusion

The world is in transition from the centralized Industrial-based Revolution to a decentralized Information-based Revolution. The new "You tube generation" of young workers will be more adapt to take advantage of this transformation and create a major paradigm shift in our economy.



We must give them the opportunity to find creative, out-of-the-box solutions to solve the problems that we have created for them to solve.

As regional planners, we have the responsibility to think globally as well as act locally in order to create a sustainable global future for all generations to come.

Sincerely,



Les Hamasaki
Executive Director

cc.

Richard Dixon, President

Harry Baldwin, First VP

Jon Edney, Second VP

Garry Ovitt, Past President

Debbie Cook, Energy & Environment

Mike Ten, Transportation & Communications

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GIVE

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South Coast Air Quality Management District

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*Office of the Executive Officer
Barry Wallerstein, D.Env.*

August 8, 2008

Mr. Hasan Ikhata
Executive Director
Southern California Association of Governments
818 W. 7th Street
Los Angeles, CA 90012

Comments on Regional Comprehensive Plan (RCP)

Dear Mr. Ikhata:

Thank you for the opportunity to provide comments to the Draft 2008 Regional Comprehensive Plan (RCP). We anticipate that the proposed regional transportation policies identified in the RCP will contribute to the accomplishment of our region's goals for clean air, mobility and land use.

Our comments to the Draft 2008 RCP primarily focus on the proposed Air Quality and Transportation policies. We realize the enormity of the task of developing policies that meet the regional demands of air quality, growth and mobility, given the limited funding resources available. Therefore, roles, responsibilities and actions for all stakeholders must be clearly identified and defined.

As the proposed regional planning policy blueprint, the Regional Comprehensive Plan should clearly identify the local, state or federal legal requirements, commitments, and enforcement mechanisms. Details on these mechanisms, as well as any actions that may require a plan update or amendment, should be identified.

The RCP identifies numerous regional transportation challenges in meeting the attainment schedule for National Ambient Air Quality Standards. Therefore, policies in the Plan should provide guidance on system continuity and efficiency in order to achieve long-term regional benefits. For example, the Goods Movement discussions should

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include policies and initiatives that will encourage adoption of zero emission technologies as well as the implementation of projects that result in reductions in engine idling and diesel engine emissions. Further, the draft RCP should include policies that specifically move the region towards a zero emission transportation system, such as introduction of system-wide rail electrification projects for freight and passenger movement. A more aggressive approach should be identified for establishing freight/intermodal initiatives and policies; details of that coordination effort should also be included as a part of the Intergovernmental Review/Best Practices process to be incorporated into local general plan updates.

As a part of the Intergovernmental Review/Best Practices process, emphasis could be placed on transitioning fleets to alternative fuels and on future plans for supporting infrastructure to reduce the region's use of carbon based fuels, gasoline and diesel fuels. The RCP states that regional transportation funding has a shortfall of approximately \$26 billion. Efforts to mitigate this funding challenge would be initiatives and policies that will garner public/private partnership to support and complement, at a minimum, the major investments and strategies identified in the 2007 AQMP.

The RCP states that SCAG is responsible for developing Transportation Control Measures (TCMs). This statement should be expanded to indicate that SCAG will also work with the project sponsors and County Transportation Commissions (CTCs) to identify specific areas for potential TCM project implementation. Currently, the federal conformity rule requires that SCAG, as the metropolitan planning organization, perform specific actions as identified below. Proposed actions, if any, beyond what is currently required as an MPO should be identified. If no additional actions are to be taken, the language should indicate that these actions are a federal requirement.

- (AQ-1.1) Ensuring that transportation plans, programs and projects are consistent with State air quality plans for attaining and maintaining the health-based NAAQS;
- (AQ-1.2) Ensuring compliance with the Transportation Conformity rule, including the new air quality standards for fine particulate matter (PM_{2.5}) and 8-hour Ozone;
- (AQ-1.3) Ensuring that there is continued development of TCMs in the SCAB;
- (TR-5) SCAG shall monitor progress of the RTP, including timely implementation of projects, programs and strategies.

In order to clarify SCAG's role, we recommend that clarifications/revisions be made to certain policies as follows:

- The RCP Executive Summary Roles and Responsibility discussion for SCAG should clearly state what is meant by "the financial incentives and other means being offered by SCAG's Regional Council to promote sound planning policies"; and outline how local jurisdictions will be able to compete and qualify to be a recipient of these incentives.

Mr. Hasan Ikhrata

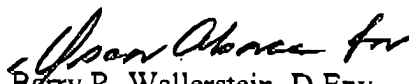
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- The RCP states that SCAG can help advance integrated policies through its funding decisions. This statement should be revised to read that SCAG should commit to working with the CTCs and project sponsors at the earliest planning opportunity to establish project funding priorities that will result in maximum mobility and air quality benefits.
- Pg. 83 – “SCAG” can prioritize funding for planning and or transportation projects that are most consistent with the RCP policies.” This policy should identify SCAG’s role in conjunction with the appropriate CTC in prioritizing funding or projects.
- Pg. 83 – “SCAG will provide guidance and incentives for public agencies to adopt best practices that support the technology-based control measures in the AQMP.” Those incentives should be defined.
- Pg. 86 – (AQ-1) “SCAG shall implement control measures from the local Air Quality Management Plan by...” The statement should be revised to read that SCAG will work with CTCs to ensure that control measures from the local Air Quality Management Plan are implemented in a timely manner.

The District looks forward to working with all stakeholders on the tremendous task of balancing our region’s limited resources with our collective efforts to achieve regional air quality benefits, mobility and growth in the SCAG region. Thank you again for the opportunity to comment on the Draft 2008 Regional Comprehensive Plan. Please direct any follow-up questions regarding the AQMD’s comments to Dr. Elaine Chang, Deputy Executive Officer of Planning, Rule Development and Area Sources at (909) 396-3186.

Sincerely,


Barry R. Wallerstein, D.Env.
Executive Officer

EC:CG:KH:ES



GATEWAY CITIES

COUNCIL OF GOVERNMENTS

August 11, 2008

Mr. Hasan Ikhata, Executive Director
Southern California Association of Governments
818 West 7th Street, 12th Floor
Los Angeles, CA 90017

Dear Mr. Ikhata:

Comments on Draft 2008 Regional Comprehensive Plan

On behalf of the Gateway Cities Council of Governments, I am pleased to submit the following comments on the draft 2008 Regional Comprehensive Plan (RCP).

We appreciate that SCAG has undertaken the effort to identify constructive regional policies on a wide range of inter-related planning issues.

It is our understanding that the policies in the RCP are voluntary and not binding on us or any jurisdiction other than SCAG. However, numerous suggested policies in the RCP are directly relevant to actions taken by local government. Primary among these is the authority to make land use decisions. Many other local government recommendations are included in the RCP policy lists.

Moreover, the RCP refers to the development of performance measures that will allow SCAG to gauge how well local governments are adhering to suggested regional policies.

In light of SCAG's intention to track local governments' progress and performance, we request that SCAG continue to work closely with the Gateway Cities COG following RCP adoption. In particular, we ask that a technical working group be convened involving the subregions, including the Gateway Cities, and other stakeholders. This will help ensure that there is a full and continuing opportunity for input on the development of any RCP performance measures and on the further evolution of suggested local government policies. We also request that periodic briefings on these policies be provided to our Board.

Again, we thank you for the opportunity to comment on this Plan and we look forward to working with SCAG to develop it further.

Sincerely,

Anne M. Bayer, President, Board of Directors
Gateway Cities Council of Governments and
Councilmember City of Downey